



department of water, air and waste management

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CERTIFIED MAIL

June 5, 1984

EPA-ARWM/SPRS

JUN 06 1984

Region VII, Kansas City, Missouri 64106

Mr. Michael J. Bauer
Gulf and Western Manufacturing
P.O. Box 999
Southfield, MI 48037

RE: Eagle Signal IAD051001337 - Davenport
Hazardous Waste Closure Plan, Cost Estimate and Financial Requests

Dear Mr. Bauer:

This letter is sent in response to the closure plan and financial documents for the hazardous waste activities at the Eagle signal facility in Davenport submitted to this Department on February 29, March 23, 1984 (closure plan prepared in March, 1980) and April 11, 1984. The information submitted does not fulfill all closure plan, financial and drum storage area requirements. The following paragraphs pertain to those requirements that must be addressed:

Closure Plan (40 CFR 265 Subpart 4)

1. Identify the decontamination steps to be used to clean any residues in the drum storage area, run off area and equipment used in the decontamination process (40 CFR 265.112(a)(3) and 265.114).
2. The plan must discuss the type of testing and criteria (if needed) to be used to determine whether the clean-up residues are contaminated. (40 CFR 265.112(a)(3)).
3. The plan must discuss the testing (visual or physical/chemical) and criteria to be used to demonstrate adequate clean-up (40 CFR 265.112(a)(1) and (3)).
4. The plan must identify the source and type of materials and equipment needed to implement the plan. Also, the plan should identify the amount of labor required (40 CFR 265.112(a)(1) and (3)).
5. The plan must specify a final closure date (40 CFR 265.112(a)(1)). Please note that this date should represent either the design life of the structure or the actual date the handling process regulated under interim status would cease.



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6. A schedule for final closure must be given (40 CFR 265.112(a)(4)). The schedule should include:
 - a. date closure is expected to begin;
 - b. total time required to close;
 - c. time required to remove waste;
 - d. time required to perform decontamination steps;
 - e. time required to do sampling, and;
 - f. time required to submit closure certification.
7. When closure is completed, certification must be submitted by both the owner and an independent professional engineer registered in Iowa that the facility was closed properly. (40 CFR 265.115 and Chapter 114 of Code of Iowa). The plans should note this.

Financial Documents

8. In a March 13, 1984 letter to you the Department noted deficiencies in an Aetna Life & Casualty Company certificate of insurance and that the First State Insurance Company certificate of insurance must be submitted. As of today these documents have not been submitted.

Drum Storage Area

9. Past site inspections have indicated that the drum storage area is not 50 feet from the property line. To correct this, the company representatives have indicated to this Department's regional office personnel that they will move the drums to the 5th floor of the manufacturing building. This may even be a worse location.

The NFPA-30 Flammable and Combustible Liquids Code 1981 enforced by the Fire Marshal would regulate where the ignitable hazardous waste can be stored. The Department requests that the company representatives contact Larry Hartman, of the Scott County Municipal, Civil Defense and Emergency Planning Agency, at 319/326-8663 for assistance. Please note that the Department will not begin to process the recent request to change Eagle Signal's hazardous waste status to a small quantity generator until:

1. an acceptable drum storage is located;
2. closure plan is submitted and approved;

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3. compliance with all financial requirements are demonstrated; and
4. a letter from at least a vice president level request the change in the hazardous status of the facility.

The above requested information must be submitted to this Department by July 15, 1984. Failure to submit the information by that date may result in enforcement action. If you have any questions on the above, please contact me at 515/281-8964.

Sincerely,

PROGRAM OPERATIONS DIVISION



Mrs. Barbara Cook, P.E.
Air & Waste Permits Branch

cc: Jim Lindsay, Eagle Signal, Davenport, IA
Chet McLaughlin, EPA Region VII
Region 6

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